

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LONESTAR AIRPORT HOLDINGS, LLC, § <i>Plaintiff,</i> § v. § § CITY OF AUSTIN, TEXAS, § <i>Defendant.</i> § §	§ § § § § § §	CIVIL ACTION NO. 1:22-CV-00770-RP
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**JOINT STIPULATION REGARDING
DEFENDANT’S MOTION FOR PROTECTIVE ORDER**

Defendant the City of Austin, Texas (the “City”) and Plaintiff LoneStar Airport Holdings, LLC (“LoneStar”) enter into the following stipulation regarding the City’s motion for protective order (Dkt. No. 88) filed on April 14, 2023:

Because the City requires additional time to confer with LoneStar regarding the motion for protective order, and for the sake of judicial efficiency, the City hereby withdraws its motion for protective order, without prejudice to refiling within two weeks of LoneStar declaring an impasse in the meet and confer discussions. In the event the parties cannot resolve the issues in dispute, the parties agree that the City may refile its motion (as amended to reflect any agreements between the parties) and that LoneStar will not object to the refiled motion on the ground that it was filed after the deadline to do so. The parties further agree that LoneStar reserves and does not waive any other potentially applicable objection or defense to the refiled motion.

Signed this ____ day of _____, 2023.

HON. ROBERT PITMAN
United States District Judge

Stipulated and agreed:

/s/ Thomas J. Forestier

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CERTIFICATE OF SERVICE

I hereby certify that, on April 19, 2023 I electronically submitted the foregoing document with the clerk of the United States District Court for the Western District of Texas, using the electronic case management CM/ECF system of the Court which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ Thomas J. Forestier
Thomas J. Forestier

CERTIFICATE OF CONFERENCE

I hereby certify that on April 17 and 18, 2023, I conferred with counsel for LoneStar, who agreed to enter into this stipulation.

/s/ Stephen R. Clarke
Stephen R. Clarke